

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

IN RE:

WILLIAM LEE WALLIS, JR.,

Debtor(s).

Chapter 13

Case No. 16-60186

AMENDED MOTION TO EXTEND TIME TO FILE BALANCE OF SCHEDULES
AND STATEMENTS AND CHAPTER 13 PLAN

William Lee Wallis, Jr., Debtor herein, by counsel, moves this Court to extend the deadline for him to file the Balance of Schedules and Statements and his Chapter 13 Plan until March 7, 2016 and for his reasons states as follows:

1. The Debtor filed his chapter 13 bankruptcy case *pro se* on February 4, 2016.
2. Order to Appoint Counsel in this chapter 13 case was entered by the Court on February 19, 2016.
3. The Debtor filed his Motion to Extend Time to File Balance of Schedules and Statements and Chapter 13 Plan on February 18, 2016.
4. The Agreed Order to Extend Time to File Balance of Schedules and Statements and Chapter 13 Plan was entered by the Court on February 22, 2016.
5. The Debtor's meeting of creditors scheduled for March 8, 2016 is continued to April 19, 2016.
6. Debtor's counsel continues to obtain additional information necessary to complete Debtor's Balance of Schedules and Statements and Chapter 13 Plan.
7. No creditors or parties in interest will be prejudiced by the granting of this Motion.
8. Accordingly, the Debtor requests to have until March 7, 2016 to file his Balance

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of Schedules and Statements and Chapter 13 Plan.

WHEREFORE, William Lee Wallis, Jr. moves this Court to extend the time to file his Balance of Schedules and Statements and Chapter 13 Plan in accordance with the proposed order, attached hereto as Exhibit A.

Respectfully submitted,

WILLIAM LEE WALLIS, JR.

/s/ Andrew S. Goldstein
Of Counsel

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Certificate of Service

I hereby certify that on this 4th day of March, 2016, I caused the foregoing to be electronically filed with the United States Bankruptcy Court thereby causing electronic service upon Herbert L. Beskin, Chapter 13 Trustee, and all registered users of the CM/ECF Filing System that have appeared in this case.

/s/ Andrew S. Goldstein

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